

Exhibit 1

Allegra Noonan

From: Valdi Licul <vllicul@wigdorlaw.com>
Sent: Monday, July 24, 2023 5:13 PM
To: Theresa Trzaskoma; John S. Crain
Cc: Rita Glavin; Allegra Noonan
Subject: RE: July 22 Order

Theresa – We reserve the right to use the reports as permitted by the Federal Rules of Evidence. Best,

Valdi Licul

Partner

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From: Theresa Trzaskoma <TTrzaskoma@shertremonte.com>
Sent: Monday, July 24, 2023 4:24 PM
To: Valdi Licul <vllicul@wigdorlaw.com>; John S. Crain <jcrain@wigdorlaw.com>
Cc: Rita Glavin <rglavin@glavinpllc.com>; Allegra Noonan <anoonan@shertremonte.com>
Subject: July 22 Order

Valdi and John,

As I'm sure you saw in Friday's Memorandum and Order in the miscellaneous actions (22-MC-3027; 22-MC-3044), Judge Merkl held that “[w]hether the [OAG and AJC] investigations were ‘independent and exhaustive’ is not a question that the Trooper 1 jury will need to decide.” Order at 30.

Given your client's allegations about the investigations, we want to confirm your client's position. Can you please let us know as soon as possible whether your client intends to rely on the OAG and AJC investigations in any way at trial, including but not limited to attempting to (i) make any reference to the OAG and AJC investigations or reports such as whether those investigations were “independent and exhaustive”; and/or (ii) introduce the contents (either in whole or in part) of the OAG and/or AJC reports?

We ask for a prompt response so that we can evaluate how to proceed.

Thanks,
Theresa

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